

REMARKS

Reconsideration of the present application is respectfully requested.

Notice that claims 1-7, 10, 11 and 13-21 are either allowed or allowable if rewritten is acknowledged with appreciation.

Amendments herein made to the claims are not made in view of any patentability issues regarding any of the claims. The amendments are made to more fully claim the scope of the present invention.

The rejection of claims 8, 9 and 12 under 35 USC 102(e) as being anticipated by Ju et al. is respectfully traversed.

For a prior art reference to anticipate in terms of 35 U.S.C. 102, every element of the claimed invention must be identically shown in a single reference. *In re Bond*, 15 USPQ2d 1566, 1567 (Fed. Cir. 1990). (Emphasis added.)

Claim 8 features a realizing module operable to generate an equalization filter for filtering one or more resonance mode(s) that are in the actual VCM plant response but are not in the ideal VCM plant response. Ju et al. disclose a notch filter as stated in the Office Action. However, Ju et al. do not disclose that the notch filter is generated to filter one or more resonance mode(s) that are in the actual VCM plant response but are not in the ideal VCM plant response.

Instead, Ju et al. simply disclose at col. 12, lines 20-21, that "a notch filter function that dampens mechanical resonances." That disclosure nowhere identically shows that the notch filter filters one or more resonance mode(s) that are in the actual VCM plant response but are not in the ideal VCM plant response as featured in claim 1. Further disclosure of the notch filter equation at col. 12, lines 37 *et seq.* also fails to disclose that feature of claim 8. Since this feature is not identically shown in Ju et al., claim 8 is not anticipated and is allowable. Claims 9 and 12, along with claims 10, 11 and 13, are also allowable due to their dependence on allowable claim 8.

Comments on Reasons for Allowance

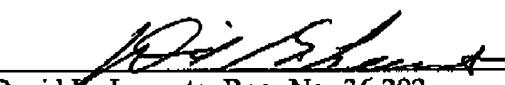
Applicant affirmatively denies any acquiescence to the Statements of Reasons for Allowance in this case. While the Applicant agrees that the claims are allowable, applicant traverses any view that that patentability resides in each feature, exactly as expressed in the claims, nor that each feature is required for patentability.

This Reply is believed to be responsive to all points raised in the Office action. Accordingly, prompt allowance and passage of the application to issue are earnestly solicited. Should the Examiner have any remaining questions or concerns, he is encouraged to contact the undersigned attorney by telephone to expeditiously resolve such concerns.

Respectfully submitted,

Seagate Technology LLC
(Assignee of the Entire Interest)

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Date


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